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ORIGINAL

NO. 87-7199

Supreme Court, U.S.
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IN THE
SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1987

DISTRIBUTED
JUL 22 1988

JESSE LEE,

Petitioner,

v.

STATE OF GEORGIA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF THE UNITED STATES

BRIEF IN OPPOSITION FOR THE RESPONDENT

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QUESTIONS PRESENTED

I.

Did the Supreme Court of Georgia properly conclude that there was no error in denying the motion for a change of venue?

II.

Did the Supreme Court of Georgia properly conclude the Petitioner had simply failed to establish any factual basis for his assertion that 18 to 29 year olds were a cognizable class?

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PART ONE

STATEMENT OF THE CASE

Petitioner, Jesse Lee, was indicted in a three count indictment for malice murder, felony murder and armed robbery, although there was only one victim. After various pretrial hearings, the case came on for a trial before a jury beginning on May 11, 1987. The jury convicted the Petitioner on all three counts on May 13, 1987. (R. 115). The case proceeded to a sentencing trial at which time the jury was advised that the felony murder count would merge with the malice murder count, then the jury thus determined the sentence to be imposed for the offense of malice murder. The jury found the presence of two statutory aggravating circumstances, i.e., that the offense of murder was committed during the course of another capital felony, to wit, armed robbery, and that the offense of murder was committed for the purpose of obtaining money or other things of monetary value. The jury then voted to impose the death penalty. Petitioner was sentenced on May 27, 1987, by

the trial court to the death penalty for murder and also to a consecutive life sentence for the armed robbery.

Petitioner filed a motion for a new trial on June 8, 1987, and an amendment thereto on July 8, 1987. (R. 119-122). The motion for new trial was denied on July 23, 1987.

Petitioner then filed a direct appeal to the Supreme Court of Georgia challenging his convictions and sentences. That court affirmed the convictions and sentences on February 25, 1988. Lee v. State, ___ Ga. ___, 365 S.E.2d 99 (1988).

PART TWO

STATEMENT OF FACTS

Barbara Martin testified at the trial that she was employed at H & W Motors. The victim, Spec Prather, worked there as a wrecker driver. At about 2:00 p.m. on August 4, 1986, Spec Prather answered a call. He returned after having been unable to find the car or person who called. (T. 301-302). Ms. Martin testified that on August 5, 1986, she received a call between 10:00 a.m. and 10:30 a.m. from a black male stating that there was a car at Rolling Hills trailer park that needed to be moved. Mr. Prather was not there at that time, but she told the man that she would take his name and number and have Mr. Prather call him back. The man said he was not where he could have a call returned. (T. 303). Approximately thirty minutes later, the man called back and Mr. Prather was still not there. She received another call in another thirty minutes and Mr. Prather was still not back and the man still would not leave a message. The phone rang again at approximately 12:15 p.m. and Mr. Prather was walking in the door. (T. 305). Ms. Martin handed Mr. Prather the phone. She heard his end of the conversation and gathered that there was a car at Rolling Hills trailer park and there was a man to be picked up on Church Street. Ms. Martin testified that the victim was known to carry money. She did not hear anything further from Mr. Prather after he left to answer that call. (T. 306).

Al Yarbrough was an investigator for the Walton County Sheriff's Department. He received information on August 5, 1986, that Spec Prather and nis wrecker were missing. Mr. Yarbrough started calling in deputies to look for Mr. Prather.

Deputy Harold Edmondson testified that approximately 7:45 p.m. on August 5, 1986, he participated in a search for Spec Prather. He and Deputy Harrison were in a plane looking for the wrecker. They subsequently located a white wrecker on Vasco Adcock Road and radioed the office. (T. 139). When he arrived at the scene, it had already been secured. (T. 140).

Various other officers went to the scene where the wrecker was located. Investigator Yarbrough testified to being at the scene on August 5, 1986, and making plaster casts of footprints at the scene. He also had the wrecker towed so that fingerprints could be taken. Based upon other information received, he placed a lookout for the Petitioner, Jesse Lee. (T. 162).

Bill Durden also went to the scene on August 5, 1986. He observed tire tracks at the scene. He made measurements of the tracks for future comparison. (T. 317.

Edward "Teenie" Towler testified that he was staying with his daughter on Davis Street on August 5, 1986. On that day he was standing outside and saw the Petitioner with a man that he later identified as Roy Lee, Petitioner's brother. Towler had known the Petitioner for a long time and started talking to him. He asked the Petitioner why he was there. (T. 146-7). Towler subsequently saw a wrecker coming down the road while he was there talking to the Petitioner. The wrecker stopped at the corner and the Petitioner and the man with the Petitioner got into the wrecker. (T. 153).

Based upon the information provided by Teenie Towler, Investigator Yarbrough put a look out for the Petitioner. On August 6, 1986, Petitioner voluntarily came to the police station. At that time he was not under arrest. (T. 163). The Petitioner signed a waiver of rights and gave a taped statement beginning at 6:23 p.m. Prior to giving the taped statement, the Petitioner had told the authorities where they could find the bag containing the wallet and papers of the victim. Deputy Johnny Smith went to the location and found the paper sack containing a wallet and papers belonging to the victim. (T. 246).

Other evidence that developed showed that Betty Williams and her husband owned a Christmas tree farm near the location where the wrecker was found. On the day that Mr. Prather was killed, Mrs. Williams and her husband were at the farm around

3:30 p.m. They recalled seeing the wrecker and in fact drove their Toyota truck near the wrecker. The tire prints from the truck were later determined to match those at the scene. She also testified to being out and walking around in a particular type of shoe that matched one set of footprints at the scene. Mrs. Williams did testify that she saw two sets of prints leading away from the wrecker. (T. 270).

On August 6, 1986, Petitioner's brother, Roy Lee, was arrested. Found at the residence where Roy Lee was staying was a .22 caliber revolver. A subsequent comparison of that revolver with the bullet recovered from the body of the victim showed that the bullet could have been fired from that gun. (T. 314).

Dr. Byron Dawson conducted an autopsy on the victim at approximately 1:30 a.m. on August 6, 1986. He found a gunshot entry wound to the right temporal region and swelling on the left side of the head. There was no exit wound. (T. 368). Based upon the powder residue and the nature of the wound, he determined that the wound could be best described as a near contact wound. (T. 370).

A search was subsequently conducted of the residence of Sue Nett Williams, where the Petitioner stayed. Clothing was retrieved from that residence, including a pair of white shorts with blood on them and a pair of shoes. It was determined that the shorts belonged to Sue Nett Williams rather than the Petitioner and, while the blood type did match that of the victim, it also matched that of Sue Nett Williams. (T. 378). A pair of shoes found in the residence, which were identified as being the shoes the Petitioner wore on the day in question, were found to have blood on one shoe, although the blood could not be typed. (T. 383).

Sue Nett Williams testified at trial that she lived at 207 West Washington Street. The Petitioner had been her boyfriend since 1985 and had lived with her. (T. 413). On August 5, 1986, she got up around 7:30 a.m. to send the children off.

The Petitioner was there at the time. According to Sue Nett, several people were out in the yard when Roy Lee came down to the house. He talked with the Petitioner and then Roy Lee and the Petitioner left the house walking between 8:30 a.m. and 9:00 a.m. (T. 414).

Sue Nett went down to Rosa Mae Byrd's house to get some collards. Ms. Byrd had called for Sue Nett to come get the collards. Sue Nett went down with her gown and housecoat on and then came back to the house. (T. 416). This was corroborated by Rosa Mae Byrd who testified that she lived at 210 Washington Street right below Sue Nett Williams and across the street. She called Sue Nett down to her house between 9:30 and 10:00 a.m. and gave her some collards. Sue Nett was in her gown and housecoat. (T. 343).

Otis Williams also testified to going to Sue Nett Williams' house somewhere between 8:30 and 9:00 a.m. on the day of the crime. He noted that Sue Nett was not feeling well that morning. Roy Lee was there and Mr. Williams testified that Roy Lee and the Petitioner left walking. The Petitioner was wearing slick bottom shoes at the time and Mr. Williams thought they were some kind of white shoes. (T. 346).

Willie Byrd was the father-in-law of Sue Nett Williams. Mr. Byrd went to Sue Nett's house on August 5, 1986 before 12:00 p.m. He stayed there until approximately 2:00 p.m. According to Mr. Byrd, Sue Nett was home and the Petitioner was not there originally. The Petitioner subsequently arrived closer to 2:00 p.m. and came to the house on foot. (T. 340).

According to Sue Nett Williams, on August 5th, between 12:30 p.m. and 1:00 p.m., she received a phone call at the city barn. She did not have a telephone in her residence and received calls at the phone in the barn. The Petitioner was on the telephone and said he was at Roy Lee's house. (T. 417).— Sue Nett testified that Petitioner came back to the house at approximately 1:30 p.m. He went to the bathroom and said he

was going to take a bath. She said it was out of the ordinary for Petitioner to take a bath in the middle of the day. (T. 419).

The Petitioner showed Sue Nett some money including a $100.00 bill, a $50.00 bill and some other money. He told Sue Nett that he had won the money at Roy's house. He changed clothes at that time. (T. 420).

Wilma Williams, Sue Nett's mother, also testified to being at the house on August 5th, and seeing the Petitioner leave with his brother Roy Lee on foot. She identified the shoes which had been determined to have a spot of blood on one shoe as those the Petitioner was wearing when he left. She further testified that when the Petitioner came back that afternoon he changed shoes and clothes. (T. 350-351).

Doug Robinson was married to Sue Nett Williams' daughter. He and his wife went to Sue Nett's house on August 5th, between 4:00 and 4:30 p.m. At that time everyone was talking about the Petitioner having some money. Robinson asked the Petitioner where he got the money and Petitioner did not want to say. The Petitioner finally told Robinson that he shot somebody. (T. 354). Robinson did not take the Petitioner seriously at that time.

Later in the day, the Petitioner and Sue Nett Williams walked to town and the Petitioner had Sue Nett buy a gun. Al later that evening they went to Walnut Grove and got some liquor and beer. They also went with some other people to get something to eat. (T. 422).

Evelyn Byrd testified that she was the daughter of Rosa Mae Byrd. On August 5, 1986, she was living in George Walton Homes and Jimmy Lee was her boyfriend off and on. On Tuesday, August 5, 1986, she gave Jimmy Lee a ride when she saw him walking down the street around 12:00 noon. They then stopped off at her mother's house where they dropped off her child. Evelyn Byrd then left to pay bills at various locations. She testified that Jimmy Lee was with her the whole time. She

subsequently took Jimmy Lee over and let him out at Julia Reynold's house. After she let Jimmy Lee out of the car, she was on her way to her aunt's house and stopped at a stop sign. She saw the Petitioner and Roy Lee walking down the street. She testified that this would have been approximately 1:30 p.m. (T. 361).

Sue Nett testified that on the morning of Wednesday, August 6, 1986, they got up and she and the Petitioner went to town. The Petitioner bought a pair of shoes and some pants. Also on that morning he told her to wash his shirt that he had worn on the previous day. According to Sue Nett, the shirt had blood stains on it. (T. 423).

Petitioner made a total of four statements to the authorities, all of which were admitted after being found voluntary pursuant to a Jackson v. Denno hearing. The first statement was given by the Petitioner prior to his being arrested on August 6, 1986. The taped statement began at 6:23 p.m. In that statement, Petitioner told Investigator Yarbrough that Roy Lee came by the house Tuesday morning and wanted him to go with him. Roy told the Petitioner he was getting ready to do something and needed the Petitioner to drive. Roy told the Petitioner he had been watching a man who had a lot of money and he told the Petitioner what he and Jimmy Lee were going to do. (T. 233). During this statement, Petitioner said he went to the trailer park and waited there with the car for Roy Lee and Jimmy Lee. They came walking up the road and got in the car and the Petitioner left and dropped them off. According to the Petitioner in this statement, Roy Lee gave him $305.00 to hold and Roy Lee came back the next day and got the money. Petitioner acknowledged being present at Roy Lee's house when Roy made several phone calls to the wrecker company. During this statement, Petitioner admitted hearing the contents of those telephone calls. (T. 238). Petitioner also admitted that he, Roy and Jimmy got into the wrecker together. (T. 239). The Petitioner said that he told the

driver of the wrecker he needed to get out to get some more money and so the driver let him out of the wrecker. Petitioner also told the authorities that the victim's wallet could be found in the bushes by a yellow house on the corner of Davis and Ashe Streets. (T. 243). He told the authorities that he and Roy Lee had gone to Roy's house the day before and Roy had dumped the victim's possessions out onto a table. Roy told the Petitioner to get a sack and put the papers and wallet into it, which the Petitioner did. According to the Petitioner Roy threw the sack into the wooded lot on Tuesday before 1:00 p.m. (T. 244).

The authorities subsequently talked to the Petitioner at approximately 1:00 a.m. the next morning. They wanted to inquire of the Petitioner as to precisely how he and the others got to the wrecker or out from where the wrecker was found. They had found tire tracks and the woman's footprints. At that time they did not realize that the tire tracks matched the tires of Betty Williams' Toyota truck or that the footprints matched the shoes of Betty Williams. During this statement, the Petitioner told the authorities that Sue Nett Williams had been with him. Petitioner indicated in this statement that Sue Nett had a part in obtaining the car and that Sue Nett was with him throughout the crime. He also admitted being in the wrecker with Jimmy and Roy Lee and again stated that they stopped to let him out of the wrecker and he went around to pick up Sue Nett. He and Sue Nett then drove down to where the wrecker was located to pick up Roy Lee and Jimmy Lee. When Roy and Jimmy told him what had happened, the Petitioner wanted to go see, so he went and turned the car around and parked it. He and Sue Nett went to see in the wrecker and according to the Petitioner in this statement, Sue Nett "freaked out." (T. 260). He did not realize until that point that the driver had been shot. They subsequently left the scene and the Petitioner reiterated the statement about going to Roy Lee's residence and obtaining the sack for the wallet and papers of

the victim. According to the Petitioner, they were in the car and Roy told him where to stop and Roy went and threw the sack into the bushes.

On August 6, 1986, Michael Head, the Chief of Police in Monroe received word that the Petitioner wanted to talk to him. (T. 440). He went and asked the Petitioner if he needed to talk with him and the Petitioner replied that he did and that he wanted to talk about the Spec Prather case. Chief Head went and got Eddy Sharpe and a tape recorder. He and Sharpe obtained a taped statement on August 7, 1986, at approximately 3:50 p.m. Eddy Sharpe then testified to being present when that statement was made. In this statement, the Petitioner stated that he and Roy Lee walked downtown between 8:00 and 10:00 a.m. Tuesday. The Petitioner said he put on his white tennis shoes and went to walk with Roy because Roy wanted to talk. According to the Petitioner even though Sue Nett was with him, she could not hear what Roy was saying. Roy was telling the Petitioner about a man that had some money that he and Jimmy Lee had checked out by using Julius Reynold's car. T. 449). The Petitioner said he told Sue Nett about the plan and she said "Let's do it." (T. 451). Sue Nett asked for $30.00 so she could get a car for them to use. In this statement the Petitioner said that the first thing he knew about any plan was on Tuesday. In this statement the Petitioner again asserted that Sue Nett was the one responsible for getting a car and she obtained someone by the name of Jan to help her. The Petitioner admitted being present when Roy made the phone calls to the wrecker company. He also admitted being there when the wrecker picked them up on Davis Street but this time stated that the wrecker simply picked up the Petitioner and Roy Lee. From there they went to the corner of Church Street and Wall Street where they picked up Jimmy Lee. (T. 457). As they headed toward Rolling Hills trailer park, the Petitioner allegedly told the wrecker driver to let him out so he could get some more money. He then went and picked up

Sue Nett Williams and they went down to where the wrecker was. He saw Roy with a pistol and said that Roy was still in the wrecker. As he started to back up the car he heard a shot. (T. 460. In this statement the Petitioner asserted that after the victim was shot, Sue Nett went to the victim, took her hand and pushed the wrecker driver over and removed his wallet. (T. 460). In this statement, Petitioner placed himself and Sue Nett Williams at the scene when the fatal shot was fired. The Petitioner acknowledged in this statement that all four of them had been in on the planning of the crime. He also stated that Sue Nett Williams knew what was going to happen. When asked if he knew from the beginning that the victim was going to be shot, the Petitioner responded that he did and that anyone who knew Roy Lee knew it was going to happen. He further repeated the fact that he knew Roy Lee was going to shoot the victim, that it was in the plan. (T. 474). Appellant stated in this statement that he went along with the plan because Sue Nett Williams did.

A final statement was taken from the Petitioner on Friday, August 8, 1986, at 12:45 p.m. to verify information concerning which car he and sue Nett Williams allegedly used. Although the Petitioner had previously mentioned a blue and white or blue and grayish car, the Petitioner was now stating that a green car was used. Petitioner then stated that Sue Nett Williams arranged for the car and that they obtained a green Chevrolet to use. According to the Petitioner, he and Sue Nett drove the car to Rolling Hills, but then subsequently returned the car to the city barn. He then walked to Roy Lee's house where he waited while Roy Lee made some phone calls. Petitioner, Sue Nett and Jan then walked back to Petitioner's house. They went back and got the car from the city barn and left. They went to Roy Lee's house where Roy Lee made the phone call to the wrecker company. Jan and Sue Nett then left with Jan driving the car. Petitioner and Roy were going down the street to wait for the wrecker. During this statement the

Petitioner again acknowledged being present when the shot was fired and stated that he was the one who drove after the victim was killed.

At the guilt-innocence phase of the trial, the Petitioner presented no further evidence in his behalf and did not testify.

During the sentencing phase of the trial, the State presented additional testimony from Sue Nett Williams. According to Sue Nett, on Tuesday, August 5th, after she and the Petitioner returned from Walnut Grove and McDonald's, the Petitioner got Doug Robinson's car and he and Sue Nett Williams drove to a housing project. At the project the Petitioner bought some cocaine and he and Ronnie Griffith were sniffing the cocaine that evening. Linda Robinson also testified that she was at Sue Nett's house on Tuesday, August 5th, and saw the Petitioner and Ronnie sniffing cocaine. (T. 595).

Sue Nett Williams also testified that she visited the Petitioner in jail on Tuesday, March 10, 1986. The Petitioner gave her a letter, State's Exhibit No. 42, to give to Doug Robinson. She identified the writing as being that of the Petitioner. In that letter, the Petitioner wrote to Doug Robinson concerning the situation at Sue Nett Williams' house. The Petitioner stated he had heard what was going on at the house and that one day someone was going to get hurt or take the kids away from Sue Nett. The Petitioner further wrote that he was going to get out on bond and that he was coming back and was going to "be crazy on somebody." (T. 597). The Petitioner further stated, "I'm going to kill this person. I want to kill this person real bad." (T. 598).

The state also introduced prior convictions of the Petitioner for contributing to the delinquency of a minor, two prior convictions for theft by taking, two prior convictions for theft by conversion, one for financial card theft and two counts of forgery in the first degree, theft by receiving stolen property and obstruction of an officer. The Petitioner testified in his own behalf at the sentencing phase of the

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II. PETITIONER FAILED TO ESTABLISH A FACTUAL BASIS FOR HIS CLAIM OF UNDERREPRESENTATION OF YOUNG ADULTS.

Petitioner asserts as his second allegation that 18 to 29 year olds were underrepresented in the traverse and grand jury pools. Petitioner at no time even attempts to assert that he made a factual showing that young adults were a cognizable group, but focuses almost exclusively on the numbers submitted to the trial court in an attempt to show underrepresentation.

The challenge to the jury arrays based on young adults was filed prior to trial. A hearing was held on April 23-24, 1987. At that time the Petitioner presented the testimony of Bryan Stevenson, who purported to have established the composition of the jury pool and the community as far as 18 to 29 years olds. No examination was made of the voter registration list from which the jury pools were selected.

Testimony was further presented that the jury commissioners selected jurors solely from the voter registration list and did not supplement the list in any fashion. Testimony was elicited that the jury commissioners did not seek to exclude persons based on age and that the only time young people might be excluded was if the jury commissioners knew they were in college. As to the grand jury, the jury commissioners picked the grand jury after the traverse jury roll had been selected and chose those they thought would be best qualified to serve. The Petitioner presented absolutely no other evidence.

On direct appeal, the Supreme Court of Georgia resolved this issue by holding, "Inasmuch as the defendant presented no evidence from which the trial court could have found as a fact that young persons are a cognizable group in Walton County, the trial court did not err by overruling the challenge." Lee v. State, supra, 365 S.E.2d at 102.

Petitioner has cited to no case requiring that young adults automatically be considered a cognizable group. In fact,

normally for groups except for women and blacks, the cognizability of a class has been deemed to be a question of fact to be evaluated in each individual case. See Willis v. Zant, 720 F.2d 1212 (11th Cir. 1983). As absolutely no evidence was even tendered in this case to establish the cognizability of the class, the Supreme Court of Georgia properly determined that Petitioner had simply failed to establish the basis for a constitutional claim. As young persons do not make up a constitutionally highly protected class, such as women and blacks, something further must be shown than simply to make an assertion that young adults were excluded. Under these circumstances, Respondent submits that there is simply no basis for granting the instant petition as Petitioner has established no facts from which any court could conclude that young people were a cognizable class.

CONCLUSION

For all of the above and foregoing reasons, Respondent prays that the petition for a writ of certiorari filed on behalf of Jesse Lee be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, MARY BETH WESTMORELAND, a member of the bar of the Supreme Court of the United States and counsel of record for the Respondent, hereby certify that in accordance with the Rules of the Supreme Court of the United States, I have this day served a true and correct copy of this brief in opposition for Respondent upon the Petitioner by depositing copies of same in the United States mail with proper address and adequate postage to:

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